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Attorneys for Motors Liquidation  
Company GUC Trust

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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:  
**In re** **Chapter 11 Case No.**  
**MOTORS LIQUIDATION COMPANY, et al,** **09-50026 (REG)**  
**f/k/a General Motors Corp., et al.** :  
:  
**Debtors.** **(Jointly Administered)**

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**NOTICE OF DEADLINE TO FILE RESPONSES TO  
OMNIBUS OBJECTIONS TO CLAIMS**

**PLEASE CAREFULLY REVIEW THIS NOTICE AND THE ATTACHMENTS.**

**CLAIMANTS RECEIVING THIS NOTICE HAVE FILED PROOFS OF CLAIM WHICH  
ARE THE SUBJECT OF AN OMNIBUS OBJECTION, AS LISTED ON EXHIBIT A  
HERETO.**

**PLEASE TAKE NOTICE** that, the Motors Liquidation Company GUC Trust (the  
"GUC Trust"), formed by the above-captioned debtors (collectively, the "**Debtors**") in  
connection with the Debtors' Second Amended Joint Chapter 11 Plan dated March 18, 2011,  
filed various Omnibus Objections to the claims listed on **Exhibit A** hereto (collectively, the  
"Omnibus Objections").

**PLEASE TAKE FURTHER NOTICE** that, the Omnibus Objections were previously adjourned with respect to the claims listed on Exhibit A, because the claimant indicated that he/she opposed the Omnibus Objection. However, none of the claimants filed a written response thereto.

**PLEASE TAKE FURTHER NOTICE** that, the GUC Trust will be scheduling the Omnibus Objections, as to the claims listed on Exhibit A, for a hearing. Accordingly, such claimants are hereby notified that written responses, if any, to the Omnibus Objections shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Dickstein Shapiro, LLP, attorneys for the GUC Trust, 1633 Broadway, New York, New York, 10019-6708 (Attn: Barry N. Seidel, Esq., and Stefanie Birbrower Greer, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow ); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room

2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Shaniet, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Tafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.); (xii) Gibson, Dunn & Crutcher LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator and for Wilmington Trust Company as Avoidance Action Trust Administrator, 200 Park Avenue, 47th Floor, New York, New York 10166 (Attn: Keith Martorana, Esq.); (xiii) FTI Consulting, as the GUC Trust Monitor and as the Avoidance Action Trust Monitor, One Atlantic Center, 1201 West Peachtree Street, Suite 500, Atlanta, Georgia 30309 (Attn: Anna Phillips); (xiv) Crowell & Moring LLP, attorneys for the Revitalizing Auto Communities Environmental Response Trust, 590 Madison

Avenue, 19th Floor, New York, New York 10022-2524 (Attn: Michael V. Blumenthal, Esq.); and  
(xv) Kirk P. Watson, Esq., as the Asbestos Trust Administrator, 2301 Woodlawn Boulevard,  
Austin, Texas 78703, so as to be received no later than **November 14, 2011, at 4:00 p.m.**  
**(Eastern Time)** (the "**Response Deadline**").

**PLEASE TAKE FURTHER NOTICE** that, if no responses are timely filed and  
served with respect to the Omnibus Objections listed on **Exhibit A** or any claim set forth  
thereon, the GUC Trust may, on or after the Response Deadline, submit to the Bankruptcy Court  
an order substantially in the form of the proposed order annexed to the relevant Omnibus  
Objection, which order may be entered with no further notice or opportunity to be heard offered  
to any party.

Dated: New York, New York  
October 31, 2011

/s/ Stefanie Birbrower Greer  
Barry N. Seidel (BS-1945)  
Stefanie Birbrower Greer (SG-2898)

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**EXHIBIT A**

Claimant	Claim #	Omnibus Objection
Rachel L. Boodram	69429	165th Omnibus Objection (Late Filed)
Erma Jeanine Buckley	66268	246th Omnibus Objection (No Liability)
Erica L. Davis C/O Roger Geddes, Esq.	71085	244th Omnibus Objection (Late Filed, Constructive Notice)
Jeremy De Larosa C/O Sylvia Quinn	71107	245th Omnibus Objection (Late Filed, Post Effective Date)
Linda Fisher	69960	244th Omnibus Objection (Late Filed, Constructive Notice)
Jacob Hall	70683	244th Omnibus Objection (Late Filed, Constructive Notice)
Monty R. & Lisa K. Henderson	70303	Eighty-Ninth Omnibus Objection (Late Filed)
Christeen Saulters Hinton	70245	244th Omnibus Objection (Late Filed, Constructive Notice)
Wayne Hutchinson	70264	165th Omnibus Objection (Late Filed)
Peggy L. Jernigan	70390	243rd Omnibus Objection (Late Filed, Actual Notice)
Pearly M. Jones	69398	Ninetieth Omnibus Objection (Late Filed)
Mary Lee Metzler	71126	245th Omnibus Objection (Late Filed, Post Effective Date)
Ronald L. Phillips	69818	165th Omnibus Objection (Late Filed)
Timothy Roberts	70113	111th Omnibus Objection (Late Filed)
Stephan A. Truxall Sr.	71193	245th Omnibus Objection (Late Filed, Post Effective Date)
Sudie M. Venable	70342	165th Omnibus Objection (Late Filed)